

**JUDGE DANIELS**

**ORIGINAL**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- v. -

RALPH NOLAN,

Defendant.

- - - - - X

INDICTMENT

14 Cr.

**14 CRIM555**

COUNT ONE

The Grand Jury charges:

1. On or about December 16, 2013, in the Southern District of New York and elsewhere, RALPH NOLAN, the defendant, and others known and unknown, unlawfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, NOLAN and others agreed to rob at gunpoint the residents of an apartment located in the Bronx, New York, whom they believed to be narcotics traffickers, of marijuana which had been transported from a location outside of New York, and did rob from them valuables at gunpoint.

(Title 18, United States Code, Section 1951.)

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**COUNT TWO**

The Grand Jury further charges:

2. On or about December 16, 2013, in the Southern District of New York and elsewhere, RALPH NOLAN, the defendant, and others known and unknown, unlawfully and knowingly did attempt to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would thereby have obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, NOLAN and others did attempt to rob the residents of an apartment located in the Bronx, New York of marijuana which had been transported from a location outside of New York.

(Title 18, United States Code, Sections 1951 & 2.)

**COUNT THREE**

The Grand Jury further charges:

3. On or about December 16, 2013, in the Southern District of New York and elsewhere, RALPH NOLAN, the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the attempted robbery charged in Count Two of this Indictment, knowingly did use and carry firearms, and in furtherance of such crime, did possess firearms, and did aid and abet the use,

carrying, and possession of firearms, one and more of which was brandished during the attempted robbery.

(Title 18, United States Code, Sections 924(c)(1)(A)(ii) & 2.)

**FORFEITURE ALLEGATION**

4. As the result of committing the offenses charged in Counts One and Two of this Indictment, in violation of Title 18, United States Code, Section 1951, RALPH NOLAN, the defendant, shall forfeit to the United States, pursuant to 18 U.S.C.

§ 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offenses alleged in Counts One and Two of this Indictment, including but not limited to a sum in United States currency representing the amount of proceeds obtained as a result of the offenses.

**Substitute Assets Provision**

5. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

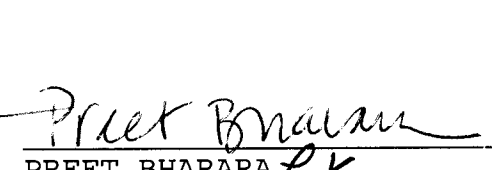
e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 981, 21 U.S.C. § 853(p), and 28 U.S.C. § 2461, to seek forfeiture of any other property of the defendants up to the value of the forfeitable property.

(Title 18, United States Code, Sections 981 and 1951;  
Title 28, United States Code, Section 2461; and  
Title 21, United States Code, Sections 841(a)(1) and 853.)



FOREPERSON



PREET BHARARA *RK*  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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- v. -

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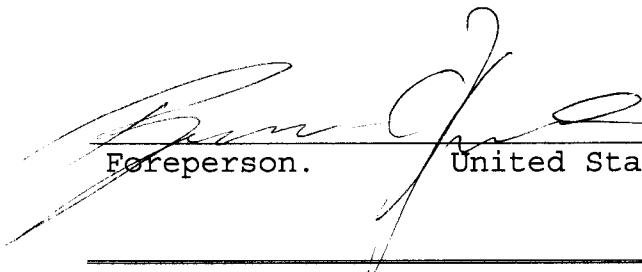
Defendant.

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INDICTMENT

14 Cr. \_\_\_\_

(18 U.S.C. §§ 1951 and 2,  
924(c) (1) (A) (ii) and 2.)

  
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Preet Bharara  
Forperson. United States Attorney.

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8/21/14 - Filed Indictment  
cc Case assigned to Judge Daniels  
Judge Gorman